DOCKET SECTION

BEFORE THE POSTAL RATE COMMISSION WASHINGTON, D.C. 20268-0001

Feb 26 3 57 M '93

POSTAL RATE AND FEE CHANGES, 1997

Docket No. R97-1

DESIGNATION BY THE DIRECT MARKETING ASSOCIATION, INC. OF ADDITIONAL WRITTEN CROSS-EXAMINATION OF UPS WITNESS SELLICK (DMA/UPS-T2-6)

Pursuant to Presiding Officer's Ruling No. R97-1/101 and Special Rule of Practice 4.A., The Direct Marketing Association, Inc. ("DMA") designates the following interrogatory response of UPS witness Sellick (UPS-T-2) to be included in the record in this proceeding:

DMA/UPS-T2: 6

This interrogatory response was received by The DMA after witness Sellick was available for oral cross-examination. Two copies of this interrogatory and response are being submitted to the Commission.

Respectfully submitted,

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Michael D. Bergman

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Counsel for the Direct Marketing Association, Inc.

Dated: February 26, 1998

CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document in accordance with Section 12 of the Commissioner's Rules of Practice, as modified by the Special Rules of Practice.

Michael D. Bergman

Dated: February 26, 1998

Washington, D.C.

ANSWER OF UNITED PARCEL SERVICE WITNESS SELLICK TO INTERROGATORY OF THE DIRECT MARKETING ASSOCIATION, INC.

DMA/UPS-T2-6. Please refer to your response to DMA/UPS-T2-1(a) where you state that "[t]he importance of assumptions which underlie an analysis depends on the impact a change in the assumptions would have on the final results." Have you performed any quantitative or statistical analysis concerning the impact that a change in any one of witness Degen's assumptions (referenced in DMA/UPS-T2-1) would have on the "final results" of Mr. Degen's mail processing cost distributions? If so, please summarize the results of your analysis and provide a copy of any report detailing your analysis.

Response to DMA/UPS-T2-6. No.

ANSWER OF UNITED PARCEL SERVICE WITNESS SELLICK TO INTERROGATORY OF THE DIRECT MARKETING ASSOCIATION, INC.

pma/ups-t2-6. Please refer to your response to DMA/ups-t2-1(a) where you state that "[t]he importance of assumptions which underlie an analysis depends on the impact a change in the assumptions would have on the final results." Have you performed any quantitative or statistical analysis concerning the impact that a change in any one of witness Degen's assumptions (referenced in DMA/ups-t2-1) would have on the "final results" of Mr. Degen's mail processing cost distributions? If so, please summarize the results of your analysis and provide a copy of any report detailing your analysis.

Response to DMA/UPS-T2-6. No.